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June 24, 2004

Ms. Marlene H. Dortch Secretary Federal Communications Commission 445 12<sup>th</sup> Street SW Washington, DC 20544

Re:

in the Matter of The Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996, CC Docket 96-128

Dear Ms. Dortch:

Chesnee Long Distance, Inc. ("CLD") submits this letter and accompanying certification as record that CLD is not a "Completing Carrier" as that term is defined in the Commission's Order in CC Docket 96-128 ("Order")<sup>1</sup>, released on October 3, 2003.

As CLD is not a Completing Carrier nor does it handle the types of calls the Commission has specified as being subject to both compensation and reporting to Payphone Service Providers, CLD is not subject to such requirements at this time. If CLD's operations are altered to the extent that CLD necessarily becomes a Completing Carrier, CLD will fully comply with the Commission's rules pertaining to this and all other payphone compensation and reporting matters.

ancaster

Sincerely,

Hannah A. Lancaster

President/General Manager

Chesnee Long Distance, Inc.

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The Pay Telephone Reclassification and Compensation Provisions of the Telecommunication Act of 1996, CC Docket No. 96-128, Report and Order, (2003) (Order).

## PAY TELEPHONE COMPLETING CARRIER CERTIFICATION OF CHESNEE LONG DISTANCE, INC.

- 1. My name is Hannah A. Lancaster. I currently serve as the President/General Manger of Chesnee Long Distance, Inc. (CLD), a provider of interstate interexchange telecommunications services as a toll reseller in the state of South Carolina. In this capacity, I have become familiar with the network operations of CLD and its practices associated with the completion of calls originated from Pay Telephones.
- 2. CLD is not a Completing Carrier as defined by Commission in 47 CFR § 64.1300.
- 3. With respect to coinless access code calls, CLD is a switchless reseller. CLD contracts with Farmers Long Distance for completion of calls originated by access code.
- 4. With respect to subscriber toll-free payphone calls, CLD is a switchless reseller. CLD contracts with Spirit Telecom for completion subscriber toll-free calls.
- 5. CLD does not perform call validation or processing functions for either access code calls or subscriber toll-free payphone calls.
- 6. CLD's does not create call detail records for either access code calls or subscriber toll-free payphone calls. CLD's action with respect to call detail records is limited to rating and billing.
- 7. CLD compensates Spirit Telecom and/or Farmers Long Distance for the wholesale cost of the call.
- 8. CLD has confirmed with Spirit Telecom and Farmers Long Distance that any calls purchased by CLD are included in the respective call tracking systems and compensation remittance process of Spirit Telecom and Farmers long Distance.
- 9. In consideration of the aforementioned facts, CLD is not subject to the compensation or reporting requirements related to the Commission's Report and Order<sup>1</sup> and associated revisions to 47 CFR Sections 64.1300, 64.1310, and 64.1320.

I certify under penalty of perjury under the laws of the United States of America that the

foregoing is true and correct. Executed on June 24, 2004.

Hannah A. Lancaster President/General Manager

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Chesnee Long Distance

P.O. Box 430

Chesnee, S.C. 29323

The Pay Telephone Reclassification and Compensation Provisions of the Telecommunication Act of 1996, CC Docket No. 96-128, Report and Order, (2003) (Order).